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District Counsel

**IN THE UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**FRESNO DIVISION**

In re

**TULARE LOCAL HEALTHCARE  
DISTRICT dba TULARE  
REGIONAL MEDICAL CENTER,**

Debtor.

Tax ID #: 94-8002897  
Address: 869 N. Cherry Street  
Tulare, CA 93274

**CASE NO. 17-13797**

**DC No.: WW-1**

**Chapter 9**

**Date:** November 16, 2017  
**Time:** 9:30 a.m.  
**Place:** 2500 Tulare Street  
Fresno, CA 93721  
Courtroom 13  
**Judge:** Honorable René Lastreto II

**DECLARATION OF LARRY BLITZ IN SUPPORT OF REPLY TO LIMITED  
OPPOSITION TO APPLICATION FOR ORDER IMPLEMENTING EFFECTIVE DATE  
ON ORDER GRANTING MOTION FOR AUTHORIZATION TO REJECT EXECUTORY  
CONTRACT**

///

1 I, Larry Blitz, declare and represent as follows.

2 1. My name is Larry Blitz.

3 2. I am the Interim Chief Executive Officer of Tulare Local Healthcare  
4 District.

5 3. I have over 40 years' experience in the management of financially  
6 distressed healthcare entities and systems. I have served as the CEO of several  
7 hospitals including district hospitals and I am authorized by the State of California to  
8 serve as a receiver of financially distressed hospitals.

9 4. By virtue of my many years' experience, I am familiar with the revenue  
10 cycle generally applicable to this District and I am generally familiar with the revenues  
11 the District should be receiving on a daily basis based on the amount of its accounts.  
12 Based on my experience I believe that the District is receiving between  
13 \$ \_\$133,000\_\_\_\_\_ and \$ \_\$150,000 dollars per business day.

14 5. I am also familiar with the various California Governmental Programs  
15 whereby the State of California makes disbursements to hospitals and I am informed  
16 and believe that the District recently received approximately \$1.3 million on account of  
17 the QAF Supplemental Income program. In the last 20 days I had participated in  
18 several face-to-face meetings with Alan Germany who is the Chief Financial Officer of  
19 Healthcare Conglomerate Associates, LLC. I have asked him point blank to tell me  
20 what sums of money are being received and how these are being disbursed. He has  
21 not answered and refuses to do so.

22 6. I have also made point blank requests of him to tell me if the above  
23 described \$1.3 million plus or minus has been received and how it has been used. He  
24 has not answered and he has refused to do so.

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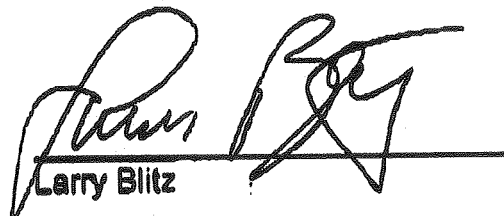
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2 7. In each one of these meetings that I have had with Mr. Germany I have  
3 asked for access to the District's computers and information system and he has  
4 refused.

5 I am over the age of 18 and if I were called as a witness in connection with this  
6 proceeding I would and could testify as I have set out in this declaration.

7 I so declare and represent under penalty of perjury this 14th day of November,  
8 2017 at Tulare, California.

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